

# **EXHIBIT A**

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**Michael D. Schwarzmenn**

2005 Kornat Drive, Costa Mesa, CA 92626  
michaelschwarzmenn@yahoo.com  
(714) 623-1854



Michael has 20 years experience providing advisory services to lender groups, companies, bondholder groups, unsecured creditors committees, and other stakeholders on financial, operational and strategic issues affecting underperforming, stressed, and distressed companies. His advisory and consulting work experience focuses on assisting distressed companies, revitalizing underperforming businesses, marketing troubled companies and advising their creditor constituents. In addition, Michael is a licensed attorney who formerly practiced bankruptcy law.

Michael has assisted clients in developing and evaluating business and turnaround plans, analyzing financial and operational performance, and formulating successful workout, restructuring or bankruptcy strategies to preserve or improve asset values for stakeholders. His industry experience includes: health care, manufacturing, agricultural, construction, restaurants and franchising, energy, travel and investment banking.

Michael has experience in identifying and implementing positive near term and long term change for client, including identifying opportunities, negotiating with constituents, and building consensus where possible.

Michael utilizes the skills and expertise garnered working for nationwide restructuring groups on a smaller platform so that he can provide reduced rates to middle market and smaller market companies.

**Michael D. Schwarzmenn**

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A financial and operational professional with over 20 years of experience acquiring, evaluating and analyzing complex data to influence strategy and profitability. Significant experience working across the organization to gain consensus toward goals, objectives and the action plan.

EXPERIENCE

FINANCIAL AND OPERATIONAL CONSULTANT

May 2017 – Present

Managing Director

Dec. 2010 – Aug. 2011

- Reduced management costs by \$20,000 per week by employing and empowering business office employee and eliminating 2+ FTE consultant
- Analyzed and focused maintenance projects to reduce cost by 50% through replacing maintenance supervisor and utilizing construction knowledge to adjust deliverables
- Developed analytical tools to reduce or eliminate creditor claims using analytical and legal principals, resulting in 50% greater payment to creditors

CROWE HORWATH, LLP

Aug. 2011 – May 2017

Managing Director

Costa Mesa, CA

- Saved over \$8 million by modeling financial scenarios incorporating legal analysis to drive negotiations; created management presentations and lead discussions.
- Prepared profitable business plan adjusting for reduced product demand driven by technological innovation, adjusting products to retain existing customers.
- Eliminated over \$100 million of debt by analyzing financial performance of 4 location business and strategizing a response to member and community litigation.
- Integrated multiple location manufacturing company into multi-billion dollar corporation, anticipating and planning for disruption, enabling integration despite seller's conduct
- Assessed partially completed government contracts to ascertain value, including negotiating legal hurdles with attorneys for the USA
- Investigated, developed and implemented creative solutions confronting entities, including designing and implementing practical insights to drive results for clients. Identified, collected, evaluated, and analyzed information to form actionable strategies. Utilized strong analytical skills to present fact based recommendations in a contentious environment.

GRANT THORNTON, LLP

Oct. 2009 – Dec. 2010

Director

Irvine, CA

- Identified \$7 million in additional value available to satisfy judgment by analyzing assets of publically traded company to ascertain ability to satisfy judgment.
- Assisted borrower in avoiding liquidation by performing operational and financial analysis resulting in positive cash flow and profitability forecast, including preparing management presentations and conducting lender negotiations.
- Monitored cash flow to assure funds were paid to sub-contractors and increased value
- Developed value maximizing strategy for a 50-company enterprise containing a solvency analysis to determine scope of secured creditor's collateral; negotiated key issue. Participated in auction of operating business to creatively maximize overall consideration.
- Utilized situational data and business acumen to develop models reflecting impact of opportunities to aid management and other decision makers, based upon the acquisition, evaluation and analysis of pertinent information, coupled with creative thinking, to develop and implement optimal strategies.

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XROADS SOLUTIONS GROUP, LLC

Dec. 2003 – Oct. 2009

Principal

Santa Ana, CA

- Determined site level profitability of 100 restaurant franchisee, including gathering and analyzing information, four wall operational analysis, multi-lender collateral review, financial performance trends, and evaluated strategic response to declining revenues.
- Re-designed employee benefit plan for nationwide company, resulting in avoidance of 10% premium increase and reduction of out of pocket costs for the majority of employees
- Completed comprehensive analysis of fast food restaurant franchisor, including historical financial reporting and preparing pro forma forecasts for interested buyers. Prepared all sale materials, led negotiations and auction.
- Performed deep and strategic data analysis to reduce Qui Tam liability by \$20 million
- Generated 8% savings on annual office supply spend for nationwide company
- Advised international manufacturing company on its liquidity event, including preparing sale materials and items for the data room, participating in management meeting and negotiating with buyers.
- Gathered, assessed, investigated, and analyzed operational and financial information for manufacturer and recommended strategy to maximize value, the advisability of WIP build out, liquidation scenarios, and litigation.

**ATTORNEY**

Bankruptcy Judge Sheri Bluebond

2001 – 2003

United States Bankruptcy Court, Central District of California

Los Angeles, CA

Assayag Mauss, APC

2000 – 2001

Attorney practicing with Orange County boutique law firm

Irvine, CA

Lewis D'Amato Brisbois & Bisgaard

1998 – 2000

Attorney practicing with one of the largest California law firms

Los Angeles, CA

Arter & Hadden

1995 – 1998

Attorney practicing with 150 year-old national law firm

Los Angeles, CA

Chief Bankruptcy Judge Calvin K. Ashland

1994 – 1995

United States Bankruptcy Court, Central District of California

Los Angeles, CA

**BUSINESS PROFESSIONAL** (Various)

1983 – 1991

Positions included performing accounting functions for a real estate developer, leading marketing efforts for a governmental agency's socio-economic forecasts, performing detailed inventory control function for multi-warehouse during active construction, and human resources for a large regional operation and created automated processes for greater data tracking.

**EDUCATION**

UCLA ANDERSON SCHOOL OF MANAGEMENT

2003

Master of Business Administration

Los Angeles, CA

LOYOLA LAW SCHOOL, LOS ANGELES

1994

Juris Doctor

Los Angeles, CA

University of Southern California Marshall School of Business

1988

Bachelor of Science in Business Administration

Los Angeles, CA

Active Member of California State Bar – Admitted to all state and federal courts in California

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 601 South Figueroa Street, Suite 2500, Los Angeles, CA 90017:

A true and correct copy of the foregoing document entitled (*specify*): **DECLARATION OF MICHAEL D. SCHWARZMANN IN SUPPORT OF THE APPLICATION OF THE OFFICIAL COMMITTEE OF EQUITY SECURITY HOLDERS TO EMPLOY MICHAEL D. SCHWARZMANN AS FINANCIAL ADVISOR NUNC PRO TUNC AS OF OCTOBER 20, 2017** will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **November 8, 2017**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Shiva D Beck sbeck@gardere.com, jcharrison@gardere.com
- Ron Bender rb@lnbyb.com
- Cathrine M Castaldi ccastaldi@brownrudnick.com
- Russell Clementson russell.clementson@usdoj.gov
- Aaron S Craig acraig@kslaw.com, lperry@kslaw.com
- Matthew A Gold courts@argopartners.net
- Monica Y Kim myk@lnbrb.com, myk@ecf.inforuptcy.com
- Samuel R Maizel samuel.maizel@dentons.com,  
alicia.aguilar@dentons.com;docket.general.lit.LOS@dentons.com;tania.moyron@dentons.com;kathryn.howard@dentons.com
- Krikor J Meshefejian kjm@lnbrb.com
- Tania M Moyron tania.moyron@dentons.com, chris.omeara@dentons.com
- S Margaux Ross margaux.ross@usdoj.gov
- United States Trustee (SV) ustpregion16.wh.ecf@usdoj.gov
- Sharon Z. Weiss sharon.weiss@bryancave.com, raul.morales@bryancave.com

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) **November 8, 2017**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) **November 8, 2017**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

**BY PERSONAL DELIVERY**

Hon. Martin R. Barash  
US Bankruptcy Court  
Central District of California  
21041 Burbank Blvd., Suite 342/Ctrm. 303  
Woodland Hills, CA 91367

☒ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

November 8, 2017 Christina O'Meara

*Date*

*Printed Name*

/s/Christina O'Meara

*Signature*

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This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

**SERVED BY U.S. MAIL:**

<b>Secured Creditor</b> Radian Wareham Holding, Inc. Attn: Mike Tutor, CEO 5305 Distriplex Farms Memphis, TN 38141	<b>Counsel to Radian Wareham Holdings</b> E. Franklin Childress, Jr. Baker, Donelson, Bearman, Caldwell & Berkowitz, PC 165 Madison Ave, Suite 2000 Memphis, Tennessee 38103	U.S. Securities and Exchange Commission Attn: Bankruptcy Counsel 444 South Flower Street, Suite 900 Los Angeles, CA 90071-9591
<b>Governmental Agencies</b>		
Internal Revenue Service P.O. Box 7346 Philadelphia, PA 19101-7346	Franchise Tax Board Bankruptcy Section, MS: A-340 P.O. Box 2952 Sacramento, CA 95812-2952	State Board of Equalization Account Information Group, MIC: 29 P.O. Box 942879 Sacramento, CA 94279-0029
Employment Development Dept. Bankruptcy Group MIC 92E P.O. Box 826880 Sacramento, CA 94280-0001		
<b>Equity Holders - SERVED BY EMAIL</b>		
Patrick W. O'Brien 301 Whitmore Lane Lake Forest, IL 60045-4707 <b>Email: obrien.pat@me.com</b>	Ronald Chez 1524 N. Astor Street Chicago, IL 60610 <b>Email: rlchez@rcn.com</b>	Scott Jarus 938 Duncan Avenue Manhattan Beach, CA 90266 <b>Email: scott.jarus@verizon.net</b>

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.